

DANIEL G. BOGDEN
United States Attorney
Nevada State Bar No. 2137

ASIM H. MODI
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 977-8952
Facsimile: (415) 744-0134
E-Mail: Asim.Modi@ssa.gov
Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LEE BELLINGER,)	Case No. 2:14-cv-1718-RFB-NJK
)	
Plaintiff,)	
)	UNOPPOSED MOTION FOR
vs.)	EXTENSION OF TIME
)	(FIRST REQUEST)
CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm and Response to Plaintiff's Motion for Reversal, due on **June 15, 2015**, by **30 days**, through and including **July 15, 2015**.

An extension of time is needed because counsel for Defendant is currently responsible for numerous district court cases at various stages of litigation. Counsel for Defendant is also currently responsible for conducting discovery and preparing substantive motions in personnel-related litigation matters pending before the Equal Employment Opportunity Commission and the Merit Systems Protection Board.

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
2 motion, on June 11, 2015.

3 Respectfully submitted this 11th day of June 2015.

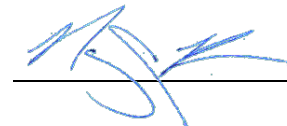
4 DANIEL G. BOGDEN
5 United States Attorney

6 /s/ Asim H. Modi
7 ASIM H. MODI
8 Special Assistant United States Attorney

9 OF COUNSEL:

10 DONNA L. CALVERT
11 Regional Chief Counsel, Region IX
12

13 IT IS SO ORDERED:

14 
15

16 UNITED STATES MAGISTRATE JUDGE

17 DATED: June 12, 2015
18
19
20
21
22
23
24
25
26